



February 23, 2011

**Via ECFS**

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for Calendar Year 2010**  
**All Access Inc. - 499 Filer ID: 826848**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2010 CPNI Compliance Certification and supporting Statement of CPNI Procedures and Compliance submitted on behalf of All Access Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with Public Notice DA 11-159 issued January 28, 2011.

Any questions you may have concerning this filing may be directed to me at 470-740-3031 or via email to sthomas@tminc.com.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to All Access Inc.

*ST/sp*

Attachments

cc: Best Copy and Printing (via email to FCC@BCPIWEB.COM)  
A. Gutierrez – All Access (via email)  
file: All Access – FCC CPNI  
tms: FCC110x CPNI

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

---

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2010
<b>Name of Company covered by this certification:</b>	<b>All Access Inc.</b>
Form 499 Filer ID:	826848
Name of Signatory:	Huguette Valle
Title of Signatory:	Chief Financial Officer

I, Huguette Valle, certify and state that:

1. I am Chief Financial Officer of All Access Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
Huguette Valle, Chief Financial Officer  
All Access, Inc.

02/22/2011  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A  
Explanation of actions taken against data brokers – not applicable  
Summary of customer complaints – not applicable

Attachment A  
Statement of CPNI Procedures and Compliance

**All Access, Inc.**

Calendar Year 2010

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

---

All Access, Inc.

Statement of CPNI Procedures and Compliance

All Access Inc. ("All Access" or "Company") operates solely as a provider of long distance prepaid debit card services sold via the internet and in retail stores not owned or operated by the Company. For cards sold at retail locations, the Company does not have any subscribed relationship with customers and does not have any identifying information regarding customers. Web-based sales do provide the Company an opportunity to build a subscribed relationship with its customers.

All Access does not use or permit access to CPNI for marketing purposes. All Access' marketing efforts are mass advertising, including internet advertising, and point of sale, and do not include the use of CPNI. Should All Access expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company however does maintain prepaid debit call detail records. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and has in place methods to discover and protect against attempts by third parties to gain unauthorized access to this information. Call detail is not available and therefore is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

Call detail is not available and , therefore, is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

Customers who purchase prepaid service via the internet are requested to establish a password on-line. Account information, including call detail, is available to customers of on-line service. In the event a customer loses or forgets the password established, the company has an authentication procedures to allow the customer to set up a new password. Information is only provided to customers via the email address established when service was initiated. Furthermore, the Company notifies customers via the email account of record whenever a password or other account information is changed without revealing the changed information.

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made to the extent the Company has such information, to customers.

All Access has not taken any actions against data brokers in the last year.

All Access did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2010.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.